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Docket No: 33546-01  
Patent**GROUP 1600**IN THE UNITED STATES PATENT AND TRADEMARK OFFICEApplicants: **Michael Aven**Serial No.: **09/491,708**Examiner: **A. Pryor**Filed: **January 26, 2000**Art Unit: **1616**For: **Non-Aqueous, Emulsifiable Concentrate Formulation****OFFICIAL**

March 20, 2002

Assistant Commissioner for Patents  
Washington, DC 20231

Sir:

Response under 37 CFR 1.116

This is in response to the Office Action mailed December 28, 2001, in this patent application.

Remarks

Favorable reconsideration of this application in view of the remarks below is respectfully requested.

Claims 1-3, 6-8, 11, 12, 15 and 16 are rejected under 35 U.S.C. 103(a) as being unpatentable over Valcke et al. The basis of the rejection is that Valcke et al discloses an emulsifiable concentrate comprising many of the components of the instant claimed composition and that one of ordinary skill in the art would have been expected to determine the optimum carbon number for the alkoxyated alcohol component as well as the optimum amounts and ratios of ingredients for the instant composition. This rejection is respectfully traversed.